REMARKS

Introduction

Claims 1, 5-10, and 13 are pending in this application, of which claims 1, 10, and 13 are independent. In this response, the rejection of claims is traversed without any amendment to the claims.

Entry of various comments regarding the claims and/or the art, in the Office Action, should not be construed as any acquiescence or agreement by Applicants with the stated reasoning, regardless of whether or not these remarks specifically address any particular comment from the Office Action.

Reconsideration of this application for allowance of all pending claims is hereby respectfully requested in view of the following remarks.

Patentability of Claims Under 35 U.S.C. § 103

Claims 1, 5-10, and 13 were rejected under 35 U.S.C. §103 (a) as being unpatentable over U.S. Patent No. 6,509,974 to Hansen ("Hansen") in view of U.S. Patent No. 6,509,903 to Yosefi ("Yosefi"). Applicants respectfully traverse.

Claims 1, 10, and 13 are independent. Claims 5-9 depend from claim 1.

Regarding independent claims 1, 10, and 13, the Office Action asserts that Hansen teaches "the rules stored in the rule storage unit" of claimed subject matter, except for a rule executed when a trap is set as an output requirement.

However, Hansen's disclosure teaches only the ability to print on oversize paper stock, setting the color of the paper to be used to blue, and so on (Col. 16 lns. 61-62, col. 17 lns. 61-62), not the rules for creating a workflow in the claimed subject matter. In contrast, Applicants'

teachings disclose the rules (R1 – R4) stored in the rule storage unit for creating the workflow in the claimed subject matter.

More specifically, each rule (R1-R4) is executed for creating a workflow. A rule (R1) is executed when output is to paper, as recited in claims 1, 10 and 13; that is, R1 requires that, when the output is to paper, each module for input processing, RIP operation processing, and printer processing is prepared (page 26, lines 13-21 of the instant application). A rule (R2) is executed when page size and paper size are designated as output requirements; that is, R2 requires that, when the page size and paper size are designated as the output requirement, i) the paper size is designated from magazine as a printer processing parameter, ii) output size (taken as a RIP operation process parameter) is set as the size, iii) an area for an image file comprising of bitmap data obtained by the RIP operation processing is reserved in the auxiliary storage, and iv) a module for an imposition layout process is inserted and the number of pages to be printed simultaneously and the position on the papers of the pages to be printed simultaneously are calculated based on the paper size and page size designated by the output requirements (page 26, line 22 to page 27, line 7 of the instant application). A rule (R3) is executed when a trap is set as an output requirement; that is, R3 requires that, when a trap is set as output requirement, a trap processor module is inserted (page 27, lines 8-10 of the instant application). A rule (R4) is executed when a special color is set as an output requirement; that is, R4 requires that, when a special color is set as the output requirement, i) the special color is considered in the RIP operation and trap processing, and ii) the number of press plates is specified (page 27, lines 11-16 of the instant application). It is respectfully submitted that these features of claims 1, 10, and 13 – the above mentioned rules stored in the rule storage unit - are not disclosed or suggested in Hansen.

Nor does the addition of Yosefi cure such deficiencies found in Hansen. Yosefi does not disclose or suggest all the features mentioned above. Yosefi discloses only that traps can be inserted into an intermediate file of a digital page file, or that trapping can be done during the rasterization process (e.g., during the RIP process) (Colum 2, lines 14-19). That is, Yosefi does not disclose or suggest all the rules stored in the rule storage unit for creating a workflow, e.g., rules for executing when output is to paper, when page size and paper size are designated as output requirements, when a trap is set as an output requirement, and when a special color is set as an output requirement.

Thus, it is respectfully submitted that it would not have been obvious to one of ordinary skill in the art to combine Hansen and Yosefi in the manner suggested by the Office Action, and even if combined, the combination would still not satisfy all the requirements of claims 1, 10, and 13. Hence, it is submitted that claims 1, 10, and 13 are patentably distinct over Hansen in view of Yosefi.

Claims 5-9 depend from claim 1, and thus incorporate all the limitations and elements therein. Claims 5-9 are thus patentable because the claims depend from allowable claim 1 and because additional limitations are presented.

Applicants therefore submit that the rejection of claims 1, 5-10, and 13 is overcome and respectfully request that the rejection of claims 1, 5-10, and 13 under 35 U.S.C. §103 (a) as being unpatentable over Hansen in view of Yosefi be withdrawn.

Conclusion

Having addressed all matters raised by the Examiner, Applicants now believe that all pending claims are now in condition for allowance. Applicants therefore respectfully request an early and favorable reconsideration and allowance of this application.

If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicants' representative at the telephone number shown below

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

Sungyong In
Registration No. 51,834

600 13th Street, N.W.
Washington, DC 20005-3096
Phone: 202.756.8000 BKS/SI:llg
Facsimile: 202.756.8087
Date: July 13, 2011

**Please recognize our Customer No. 20277
as our correspondence address.**